

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SHADEESHA BROWN and GABRIEL PEREZ,

Plaintiffs,

- against -

THE CITY OF NEW YORK, BRIAN McALEAR,
KEITH HOCKADAY, FREDERICO MARTINEZ,
JOAQUIN MORALES, ROBERT DOWNES,
THOMAS ALBANO, GERARD FLOOD, WILLIAM
HART, TIMOTHY MURPHY, KENYETTA ROUSE,
and THOMAS LONGA,

Defendants
-----X

11CV1068(AJN)

**DECLARATION OF
EUGENE M. BELLIN**

Eugene M. Bellin, an attorney admitted to practice before the Courts of the State of New York and before this Court, declares, under penalty of perjury, pursuant to 28 U.S.C. §1746, the following:

1. I am of counsel to the firm of Michelstein & Associates, PLLC, attorneys for plaintiff Shadeesha Brown.
2. I respectfully submit this Declaration and the exhibits annexed hereto on behalf of the plaintiffs in support of the Memorandum of Law in support of plaintiff Shadeesha Brown's motion for summary judgment.
3. Attached hereto as Exhibit 1 is a copy of relevant portions of Defendants' Initial Disclosures Pursuant to F.R.C.P. 26(a)(1) dated June 28, 2011.
4. Attached hereto as Exhibit 2 is a copy of relevant portions of Defendants' First Supplemental Disclosures Pursuant to F.R.C.P. 26(e) dated August 2, 2011.

5. Attached hereto as Exhibit 3 is a copy of relevant portions of Defendants' Responses and Objections to Plaintiffs' First Set of Interrogatories and Production of Documents dated August 29, 2010.

6. Attached hereto as Exhibit 4 is a copy of relevant portions of Defendants' Second Supplemental Disclosures Pursuant to Fed.R.Civ.P. 26(e).

7. Attached hereto as Exhibit 5 is a copy of the document titled Warrant Execution Supplement Report, Bates stamped NYC28 and marked as Plaintiffs' Exhibit 2 for Identification at the deposition of Thomas Murphy.

8. Attached hereto as Exhibit 6 is a copy of relevant portions of the transcript of the deposition of Thomas Murphy.

9. Attached hereto as Exhibit 7 is a copy of relevant portions of the transcript of the deposition of Keith Hockaday.

10. Attached hereto as Exhibit 8 is a copy of the Joint Pre-trial Order in this action.

11. Attached hereto as Exhibit 9 is a copy of the New York City Civilian Complaint Review Board (CCRB) Complaint Report dated October 29, 2010, Bates stamped NYC9-10.

Dated: April 15, 2013

s/Eugene M. Bellin
Eugene M. Bellin (EB0722)

Michelstein & Associates, PLLC
Attorneys for Plaintiffs
485 Madison Avenue - Suite 1300
New York, New York 10022
Tel. (212) 588-0880
Fax (212) 588-0811